

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
MARGARET W. LAMBROSE
3 Assistant Federal Public Defender
Nevada State Bar No. 116262
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 maggie_lambrose@fd.org

7 Attorney for Adam Burley

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ADAM BURLEY,

15 Defendant.

Case No. 2:18-cr-00073-KJD-NJK-1

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson,
18 United States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Adam Burley, that the
21 previously ordered deadline for filing of pretrial motions be vacated and that the parties herein
22 shall have to and including June 20, 2018, within which to file the Defendant's pretrial motions.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including July 5, 2018, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
26 shall have to and including July 12, 2018, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. Counsel for the defendant needs additional time to meet and discuss the
3 government's proposed resolution with her client; and to determine whether to file a pretrial
4 motion should her client reject the government's proposed resolution.

5 2. The defendant is incarcerated on an unrelated matter, and does not object to the
6 continuance.

7 3. The parties agree to the continuance.

8 4. The additional time requested herein is not sought for purposes of delay, but
9 merely to allow counsel for defendant sufficient time within which to discuss the proposed
10 resolution with her client.

11 5. Additionally, denial of this request for continuance could result in a miscarriage
12 of justice.

13 This is the first stipulation to continue filed herein.
14

15 DATED this 15th day of May, 2018.

16 RENE L. VALLADARES
17 Federal Public Defender

DAYLE ELIESON
United States Attorney

18 By /s/ Margaret W. Lambrose

By /s/ Christopher Burton

19 MARGARET W. LAMBROSE
20 Assistant Federal Public Defender

CHRISTOPHER BURTON
Assistant United States Attorney

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

1
2 **ORDER**

3 IT IS THEREFORE ORDERED that the parties herein shall have to and including June
4 20, 2018, within which to file the Defendant's pretrial motions.

5 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
6 shall have to and including July 5, 2018, to file any and all responsive pleadings.

7 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
8 shall have to and including July 12, 2018, to file any and all replies to dispositive motions.

9 DATED this 16th day of May, 2018.

10
11 
12 _____
13 UNITED STATES MAGISTRATE JUDGE
14
15
16
17
18
19
20
21
22
23
24
25
26